

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DAVID GOLDSTINE,

Plaintiff,

v.

FEDEX FREIGHT, INC.

Defendant.

Case No. 2:18-cv-01164 MJP

**PLAINTIFF'S PETITION FOR
ATTORNEY'S FEES PURSUANT TO
ORDER DECLARING MISTRIAL AND
SANCTIONS**

NOTE ON MOTION CALENDAR:
January 3, 2020

Without Oral Argument

Plaintiff David Goldstine, per the Court's Order Declaring Mistrial and Sanctions entered December 13, 2019 [Dkt. # 133], hereby submits his petition for attorney's fees. This petition is only for attorney's fees arising from the original Motion for Sanctions dated October 31, 2019 [Dkt. #76].

Plaintiff hereby relies upon and incorporates by reference the Declaration of Ada K. Wong in Support of Plaintiff's Request for Attorney's Fees, and is seeking \$6,600.50 in attorney's fees. Plaintiff assumes that Defendant is not going to object to Plaintiff's counsel's hourly rates as defense counsel had previously agreed to \$375/hour for attorney Ada Wong

1 when she filed her previous Motions to Compel Discovery in this matter, and to which
2 Defendant remitted. Plaintiff filed his first Motion to Compel Discovery in December 2018,
3 over one year ago, and attorney Wong has not increased her hourly rate that she is seeking
4 despite an additional year of practice and experience handling mainly employment litigation
5 matters.

6 A proposed order granting the relief requested is attached.

7
8 **DATED** December 18, 2019.

AKW LAW, P.C.

9
10 /s/ Ada K. Wong

Ada K. Wong, WSBA #45936

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CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2019, I caused to be electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED: December 19, 2019.

/s/ Kaila A. Eckert
Kaila A. Eckert, Paralegal